

REMARKS

In the above-mentioned Office Action, all of the pending claims, claims 1-7, 9-11, and 13-20 have been rejected. Claims 1, 2, 6, 9-11, 13, 14, and 20 were rejected under Section 102(e) over *Sanchez Ferreras*. And, claims 3-5, 7, and 15-19 were rejected under Section 103(a) over the combination of *Sanchez Ferreras* and *Aerrabotu*.

Responsive to the rejections of the claims, independent claims 1 and 13 have been amended, as set forth herein, in manners believed better to distinguish the invention of the present application over the cited references used thereagainst, alone or in combination. Exemplary claim 1 has been amended, first to recite now that the mobile nodes of the entries of the roaming network table are identified in terms of their respective home network portions. And, secondly, the claim has been recited, now to recite that the roaming network table is usable subsequently to determine roaming capabilities of selected coverage areas of selected network portions. Claim 13 has been analogously amended.

Support for the amendments is found, e.g., on page 13, lines 12-13 and on page 12, lines 14-17.

The rejections of the claims are respectfully traversed in light of the claims, as now-amended. That is to say, the cited references do not disclose the structure or methodology recited in the amended recitations. Specifically, neither of the cited references disclose a roaming network table in which mobile nodes are identified in terms of their respective home network portions nor provide a roaming network table usable subsequently to determine roaming capabilities of selected coverage areas. The Applicant further traverses the Examiner's repeated assertion that *Sanchez* shows roaming network table entries that are deleted when aged beyond a selected age.

Paragraph 25 of *Sanchez* describes the positioning of the processor between a network 1 and other networks 3, and the gateways 2 associated with the other networks. Paragraph 24 indicates that the disclosed system is capable of knowing which terminals are outside of their own network. And, paragraph 25 further states that information collected by a location analyzer is stored at a database 7.

While the Applicant believes the information stored at the database not to be a roaming network table as the information stored only is indicative of the terminal being present in a foreign network, even for purposes of argument, if such information is a roaming network table, paragraph 31 indicates that location cancellations correspond to an exit from the network. This cancellation is not age related as the cancellation is not a result of aging of the entry beyond a selected age, as recited in the independent claims.

Additionally, paragraph 43 indicates the MSISDN, i.e., the mobile telephone number, is stored in the table log of *Sanchez* whereas, as now amended, the roaming network table formed at the storage element identify mobile nodes in terms of their respective home network portions.

And, there is no disclosure in *Sanchez* in using the information stored at the database 7 to determine roaming capabilities, also recited in the claims as now-amended.

Aerrabotu was cited merely for showing an IMSI value used as a mobile station identity in GPRS and also fails to disclose the structure and methodology recited in claims 1 and 13, respectively, particularly as now-amended.

Claim 13 is analogously analyzed and is believed to be distinguishable for these same reasons.

The dependent claims, which include all the limitations of their respective parent claims, are also believed to be distinguishable over the cited references for the same reasons just-given for the independent claims.

Accordingly, in light of the foregoing, re-examination and reconsideration for allowance of independent claims 1 and 13, and the remaining ones of the dependent claims dependent thereon, is respectfully requested. Such early action is earnestly solicited.

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Respectfully submitted,

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